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December 8, 2017

Via ECF

Honorable Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Coleman v. City of New York, No. 1:17-cv-07265 (GHW)

Dear Judge Woods:

We represent the Plaintiffs in the above putative class action suit. We write, jointly with the Defendants, regarding the Order of Automatic Referral to Mediation, Dkt. No. 21. The parties request to be exempted from this Order, including both the Discovery Protocol and settlement provisions.

As discussed at the initial conference, this case involves allegations of a discriminatory policy that affected numerous African-American detectives, and discovery is likely to be more complex and extensive than a typical employment discrimination case. The Discovery Protocol also conflicts with the timelines in the court-ordered discovery schedule. The parties would like those deadlines to remain in place and have already exchanged a number of documents through the EEOC process.

With regard to settlement, Defendants have indicated that they are not in a position to have meaningful discussions. The parties intend to re-visit the issue of settlement at a later point in discovery. As such, the parties request that we are exempt from both the Discovery Protocol and settlement provisions of the Order.

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We appreciate your attention to this matter.

Respectfully,

/s/

Jessica Clarke

c. All counsel of record (by ECF)